

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,

vs.

TANMAYA KABRA,

Defendants

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Criminal Action No. 19-cr-10335

**DEFENDANT TANMAYA KABRA’S ASSENTED-TO MOTION
FOR RETURN OF SURETY BOND FUNDS**

NOW COMES Defendant Tanmaya Kabra (“Mr. Kabra”), by and through counsel, and hereby petitions this Court to order the return of his surety bond funds, which were paid to the Court on October 3, 2019. In support of this motion, Mr. Kabra states as follows:

1. Mr. Kabra was arrested on August 5, 2019.
2. He was released from pre-trial detention on October 3, 2019.
3. Per Mr. Kabra’s Conditions of Release dated October 3, 2019 (the “Conditions of Release”), Mr. Kabra was required to submit to home detention and GPS monitoring and submit a surety bond in the amount of \$250,000.00.
4. The surety bond was entered on October 3, 2019. (Dkt. 49).
5. The amount paid to satisfy the surety bond was loaned to Mr. Kabra by his father, Atim Kabra.
6. Mr. Kabra was sentenced on September 15, 2021. (Dkt. 176).
7. The Court ordered him committed to the custody of the Bureau of Prisons for a term of 21 months, commencing October 127, 2021. (Dkt. 176 & 177).

8. Mr. Kabra was assigned to USP Canaan and reported to that facility on Wednesday, October 27, 2021.

9. Mr. Kabra complied with the conditions of the surety bond. He appeared at all court proceedings and complied with the conditions of release. (Dkt. 49).

10. Accordingly, Mr. Kabra respectfully asks that the Court order the return of his surety bond funds in the amount of \$250,000.00.

11. Mr. Kabra respectfully requests that the funds be remitted to his legal counsel in this matter, Hinckley Allen & Snyder, LLP, as counsel to Tanmaya Kabra.

12. The \$250,000 amount will be paid on behalf of Mr. Kabra toward his restitution obligation in the future, along with the remaining amount owed by Mr. Kabra for restitution to the victims of his offenses.

13. Counsel for the Government, Assistant U.S. Attorney Christopher Looney, assents to Mr. Kabra's request.

For the foregoing reasons, Mr. Kabra respectfully requests that the Court order the return of his surety bond funds in the amount of \$250,000.00, payable to Hinckley Allen & Snyder, LLP, as counsel to Tanmaya Kabra.

Respectfully submitted,

TANMAYA KABRA

By his attorneys,

/s/ Michael J. Connolly

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Dated: November 4, 2021

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document filed through the ECF system will be sent electronically by the ECF system to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on November 4, 2021.

/s/ Michael J. Connolly
Michael J. Connolly